

AFFIDAVIT

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ZAKARI MUSAH,

Plaintiff,

vs.

HOUSLANGER & ASSOCIATES, PLLC,

Defendant.
-----X

12-CV-3207 (RWS)

AFFIDAVIT OF TODD E.
HOUSLANGER, ESQ.

STATE OF NEW YORK)
) ss.:
COUNTY OF SUFFOLK)

TODD E. HOUSLANGER, ESQ., being duly sworn, states as follows:

1. I am an attorney duly admitted and licensed to practice law in the State of New York and a member of HOUSLANGER & ASSOCIATES, PLLC, the named Defendant in the above-captioned action. As such, I am fully familiar with and have personal knowledge of the facts and circumstances set forth herein.

2. I am not a solo practitioner. Houslanger & Associates, PLLC is a professional limited liability company registered to do business in the State of New York. Currently, and in 2011, at the time that plaintiff's bank account was restrained, I had other attorneys working with me at Houslanger & Associates, PLLC on a regular basis.

3. On May 1, 2009, my firm mailed a letter to plaintiff in an attempt to collect a debt, specifically the debt upon which judgment had been entered in the Civil Court of the City of New York, County of Bronx, on April 21, 1997.

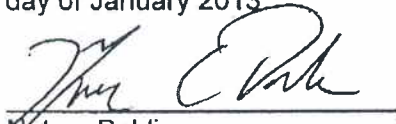
4. The letter stated that the original creditor on the matter was FCC National Bank and the current creditor to whom plaintiff's debt is owed is Palisades. A copy of the letter is annexed hereto as Exhibit "A."

5. The letter was not returned to my firm as undeliverable.

6. My firm's copy of the letter is unsigned, as in my firm's regular course of business; we do not maintain copies of this particular signed correspondence in our files. My firm's computer system creates an electronic time stamp when a document is created, and this time stamp cannot be altered.

By: 
Todd E. Houslanger

Sworn to before me this 17th
day of January 2013


Notary Public

MARIA C DAVILA
Notary Public, State of New York
No. 01DA6265282
Qualified In Suffolk County
Commission Expires July 9, 2016